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8   **UNITED STATES DISTRICT COURT**

9   **NORTHERN DISTRICT OF CALIFORNIA**

10   **OAKLAND DIVISION**

11

12 EPIC GAMES, INC.   Case No.:   4:20-cv-05640-YGR

13   Plaintiff, Counter-Defendant   **DECLARATION OF HANS GUNAWAN
                                              PURSUANT TO LOCAL RULE 79-5(e)(1)**
14   vs.   **IN SUPPORT OF ROBLOX INC.'S
                                              ADMINISTRATIVE MOTION TO KEEP**
15 APPLE INC.   **COMPETITIVELY SENSITIVE
                                              INFORMATION UNDER SEAL**
16   Defendant, Counterclaimant

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                                              Judge: Hon. Yvonne Gonzalez Rogers
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1   I, Hans Gunawan, declare as follows:

2   1.   I am the Vice President of Finance for Roblox Corporation ("Roblox"). I am over

3   eighteen years of age. I make this declaration based on my personal knowledge and pursuant to

4   Civil Local Rule 79-5 in support of Roblox's motion to maintain the information described

5   below under seal. If called as a witness, I could and would testify competently to all facts stated

6   herein as follows:

7   2.   Apple Inc.'s ("Apple") Exhibit DX-3879 discloses Roblox's highly sensitive,

8   confidential, competitively valuable information, the public disclosure of which would likely

9   have the effect of causing Roblox substantial competitive harm. Roblox restricts dissemination

10   of this information and takes steps to preserve its confidentiality to protect competitive

11   advantage with regard to key distribution platforms.

12   3.   DX-3879 is a spreadsheet which in the aggregate contains highly competitively

13   sensitive information regarding Roblox's pricing, revenues, and user data. Tab 1.E of the

14   spreadsheet contains pricing information that is no longer publicly available. Tabs 1.F and 2.A of

15   DX-3879 contain data related to Roblox's annual revenues for key distribution platforms from

16   2015 to 2020. Roblox does not share this revenue information with any third parties, except as

17   required by applicable law, unless such third parties are bound by a written confidentiality

18   agreement. The disclosure of the annual revenue data would provide an advantage to

19   competitors, who could use it to target distribution platforms that are key to Roblox's business.

20   4.   Tab 2.F of DX-3879 tracks detailed information regarding Roblox's users. Roblox

21   protects the confidentiality of this information and does not share it with any third party unless

22   such party is bound by a written confidentiality agreement. The disclosure of this user

23   information would provide an advantage to competitors, who could use it to target distribution

24   platforms that are key to Roblox's business.

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1   6.   The information reflected in DX-3879 has significant competitive value. Roblox

2 does not normally disclose this information to the public, and, as described, the company makes

3 substantive efforts to preserve its confidentiality. If the information were made public, Roblox

4 would suffer competitive harm.

5   I declare under penalty of perjury that the foregoing is true and correct.

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7 Executed on this 29 day of April, 2021

8   /s/ Hans Gunawan_____
                                               Hans Gunawan

9   **ATTESTATION**

10   Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of

11 perjury that the concurrence in the filing of this document has been obtained from the signatory

12 above.

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14   McMANIS FAULKNER
   DATED: April 29, 2021

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16   /s/ Patrick Hammon
                                               PATRICK HAMMON

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                                               Attorneys for Non-Party,
18   ROBLOX INC

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DECL.OF GUNAWAN PURSUANT TO LOCAL RULE 79-5(E)(1) ISO ROBLOX INC.'S ADMIN. MOTION
TO KEEP COMPETITIVELY SENSITIVE INFORMATION UNDER SEAL; Case No.: 4:20-cv-05640-YGR